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AUTOMOBILES—STATUTE GIVING VEHICLE APPROACHING FROM THE RIGHT THE RIGHT OF WAY—VIOLATION OF STATUTE AS CONTRIBUTORY NEGLIGENCE PER SE.—A Minnesota statute provides that the driver of any vehicle approaching an intersection shall give the right of way to any other vehicle approaching from his right. In an action to recover for damage to his car resulting from a collision with the defendant's car at an intersection, the plaintiff's own testimony demonstrated that the defendant's car was approaching from the plaintiff's right. *Held*, that the plaintiff's proceeding in violation of the statute was contributory negligence as a matter of law. *Lindahl v. Morse*, (Minn., 1921), 181 N. W. 323.

The decision merely follows the general rule that violation of a statute is negligence *per se*. *Travers v. Hartman*, 28 Del. 302, (riding a bicycle down the left side of the street); *Donovan v. Lambert*, 139 Ill. App. 532, (driving a buggy down the wrong side of the street). However, the violation of the statute must be the proximate cause of the injury. *Coffin v. Laskaw*, 89 Conn. 325; *Reynolds v. Pacific Car Company*, 75 Wash. 1. A distinction is sometimes drawn between violations of statutes and violations of city ordinances, the latter violations being merely prima facie evidence of negligence. *Scott v. Dow*, 162 Mich. 636.

BOUNTIES—DRAFTED MAN INDUCTED INTO MILITARY SERVICE BUT REJECTED AT CANTONMENT NOT ENTITLED TO BONUS.—The Public Laws of Rhode Island, Chapter 1832, Section 2, provided that a bonus be granted "To each * * * enlisted man * * * who was mustered into the federal service and reported for active duty on or after April 6, 1917, and prior to November 11, 1918." Plaintiff was inducted into service during this period but was promptly rejected upon reaching camp because of bad teeth. Upon petition for a writ of certiorari praying that the record of the decision of the Soldiers' Bonus Board disallowing the plaintiff's application for a bonus be quashed, it was *held*, that plaintiff was never mustered into the service within the meaning of the statute and therefore the plaintiff was not entitled to a bonus. *Bannister v. Soldiers' Bonus Board*, (R. I., 1921), 112 Atl. 422.

As pointed out in *Tyler v. Pomeroy*, 90 Mass. 480, "as late as the reign of Charles II, the greatest lawyers in England overlooked the distinction between martial and military law,—between the military rule, not limited to the army, which prevails in time of war, when the civil laws have lost their force, and the military discipline, necessary to the government of an army at all times." It is true, as plaintiff contended, that if he had refused to obey the order to report at camp after he had been inducted into service by the local draft board he would have been liable to punishment as a deserter—not because he had been "mustered into service," however, but because he was subject to military law and regulations as provided in Section 2 of the Selective Service law. The fact that plaintiff had received a \$60 bonus under the National Soldiers' Bonus Act is not controlling, for the provisions of that act are different from the provisions of the statute construed in the instant case. The federal bonus act contains no provision that the applicant must have been "mustered into the federal service." The interpretation put upon